

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

JUDGE LEFKOW

MAGISTRATE JUDGE BROWN

UNITED STATES OF AMERICA)

vs.)

GLORIA PINEX, also known as)
Gloria Howard)

No.

05 CR 0136

Violation: Title 18, United States

Code, Section 641

FILED

The SPECIAL MAY 2004 GRAND JURY charges:

FEB 10 2005

I. At times material to this indictment:

MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

a. The Social Security Administration ("SSA") was an agency of the United States, as defined in Title 18, United States Code, Section 6, that administered the payment of benefits from the United States of America to individuals who qualify for such benefits under various programs, including the Supplemental Security Income ("SSI") program.

b. The SSI program provided monthly cash benefits to aged, disabled, and blind individuals who met certain financial eligibility requirements. Recipients of SSI benefits were required to have resources and income below certain levels specified in the Social Security Act and applicable regulations. Resources and income above these specified levels would either render the individual ineligible for SSI benefits or reduce the amount of the monthly SSI benefit payment to which the individual was entitled.

c. Individuals seeking SSI benefits were required to submit accurate, truthful, and current information regarding their medical condition and disability to the Social Security Administration.

d. For purposes of receiving SSI benefits on the basis of disability, individuals were considered to be disabled only if they were unable to engage in substantial gainful activity due

to a physical or mental impairment that was expected to last at least 12 months or result in death.

e. If an individual's application for SSI benefits on the basis of disability was granted, the Social Security Administration would periodically review the recipient's case to determine if the individual was still disabled and still entitled to benefits. During this continuing disability review process, individuals were required to submit accurate, truthful, and current information to the Social Security Administration regarding their abilities and work activity.

f. In determining whether individuals were entitled to receive, or entitled to continue receiving, federal SSI benefits on the basis of disability, the Social Security Administration relied upon the information provided by the individuals concerning their abilities and work activity as well as their level of income and resources.

g. Individuals who received SSI benefits on the basis of disability had a duty to notify the Social Security Administration of changes in their income and resource levels.

h. In or around December 1950, defendant GLORIA PINEX applied to the SSA for a social security number. The SSA issued a social security number to the defendant ("the Pinex SSN").

i. In or around August 1966, defendant GLORIA PINEX applied for a social security number under the fictitious name of "Gloria Howard." The SSA issued a social security number in the name "Gloria Howard" ("the Howard SSN").

j. In or around March 1983, defendant GLORIA PINEX applied for SSI benefits using the name "Gloria Howard" and the Howard SSN. The SSA approved this application and defendant Pinex began to receive SSI benefit payments under the name "Gloria Howard" and the Howard SSN in or around March 1983.

k. In or around July 2000, defendant GLORIA PINEX applied for SSI benefits

using the name Gloria Pinex and the Pinex SSN. The SSA approved this application and defendant Pinex began to receive SSI benefit payments under the name Gloria Pinex and the Pinex SSN in or around January 2001.

l. In her July 2000 application for SSI benefits, defendant GLORIA PINEX failed to disclose to the SSA that she was receiving SSI benefits under the name "Gloria Howard" and the Howard SSN.

m. Defendant GLORIA PINEX received multiple SSI benefits from the SSA from January 2001 through August 2004.

2. From in or about January 2001, and continuing to in or about August 2004, at Chicago, Illinois, in the Northern District of Illinois, Eastern Division,

GLORIA PINEX, also known as
Gloria Howard,

defendant herein, did steal and knowingly convert to her own use money belonging to the United States, namely, approximately \$24,993 in funds administered by the SSA as part of its SSI program, which funds defendant was not entitled to receive;

In violation of Title 18, United States Code, Section 641.

A TRUE BILL:



FOREPERSON



UNITED STATES ATTORNEY

No.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

vs.

GLORIA PINEX, also known as Gloria Howard

I N D I C T M E N T

In Violation of: Title 18, United States Code,
Section 641

A true bill,

G. Howard

Foreman

Filed in open court this 18th day

of February, A.D. 2005

MICHAEL W. DOBBINS

Clerk

Bail, \$

*By Dana K. Howard
Deputy Clerk*